GROUNDFISH MANAGEMENT TEAM REPORT ON TRAWL CATCH SHARE PROGRAM - COST PROJECT

The Groundfish Management Team (GMT) received an overview of this agenda item from Dr. Jim Seger of Pacific Fishery Management Council (Council) staff, reviewed the materials in the briefing book, and held a discussion with Dr. Darrell Brannon to get further clarity on the proposed cost project.

The GMT appreciates the National Marine Fisheries Service's (NMFS') and the Council's interest in reviewing costs associated with the West Coast trawl catch share program and looks forward to seeing the work that Dr. Brannon brings forward in April 2023. The team did not see any issues with the project timeline proposed in Agenda Item G.8, Attachment 1, September 2022.

In GMT discussions with West Coast fishing industry members, participants from many different sectors have commented that, even in cases where fish prices are increasing (e.g., sablefish), prices are becoming less indicative of overall profits due to the currently high costs associated with fuel, purchasing permits and technologically advanced equipment (sometimes required), and other business costs. The intent of this review is to ultimately inform any potential changes to the catch share program that could minimize costs. National Standard 7 guidelines consider "factors such as fuel costs, enforcement costs, or the burden of collecting data" as examples of costs that could inform action alternative selection (50 CFR 600.340(b)). Therefore, the GMT urges the Council and NMFS to consider keeping the scope of the term "cost" broad to include costs incurred by the industry beyond just administrative costs and to consider the cumulative impacts of all costs.

The GMT also sees an opportunity to broaden the scope of the project to include the Pacific whiting at-sea sectors (catcher-processor and mothership [MS]) of the trawl catch share program in addition to the shoreside individual fishing quota (IFQ) sector of the trawl catch share program. It is the GMT's understanding that the Council could choose to broaden the scope of sectors at this meeting. It is unclear why the scope was initially limited to the shoreside sector, and we hope that a clear rationale can be provided if the scope continues to be limited to the shoreside sector. Many catcher vessels participate in both the MS and shoreside Pacific whiting sectors of the IFQ program, and that overlap should be taken into consideration if the at-sea sectors are not included.

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